

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

02 JUN 28 PM 3:26
RECEIVED
CLERK
U.S. DISTRICT COURT
WESTERN DIVISION

02 JUN 28 PM 3:26

RECEIVED
CLERK
U.S. DISTRICT COURT
WESTERN DIVISION

UNITED STATES OF AMERICA, : Case No. CR-1-02-054
Plaintiff, : (Judge Weber)
v. : **MOTION TO EXTEND MOTION**
TYREESE DORRAN PUGH, : **DEADLINE**
Defendant. :

Now comes Defendant, Tyreese D. Pugh, by and through undersigned counsel,
and hereby moves this Court to extend the deadline for filing motions for the reasons set
forth below.

Respectfully submitted,

Edward J. Felson (0041988)
Attorney for Defendant
36 East Seventh Street, Suite 1650
Cincinnati, Ohio 45202
(513) 721-2500
fax (513) 721-1120

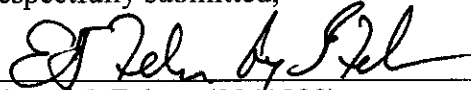
MEMORANDUM

The original deadline was Friday, June 28, 2002. However, the U.S. Attorney's
Office has not yet completed its discovery. Therefore, it is only fair to permit Defendant
to address any potential motions after discovery is complete. For these reasons, the

USA v. Pugh
Motion to Extend Motion Deadline
Page 2

motion deadline should be extended to a date not less than seven days after the
Government's discovery responses are submitted to Defendant's counsel.

Respectfully submitted,



Edward J. Felson (0041988)

Attorney for Defendant

36 East Seventh Street, Suite 1650

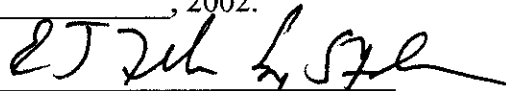
Cincinnati, Ohio 45202

(513) 721-2500

fax (513) 721-1120

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Wendy Cross,
Assistant U.S. Attorney, 221 East Fourth Street, Suite 400, Cincinnati, Ohio 45202, and
Attorney J. Robert Andrews, 2662 Madison Road, Cincinnati, Ohio 45208, by ordinary
U.S. mail ~~or hand delivery~~ this ____ day of _____, 2002.



Edward J. Felson (0041988)